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28  
UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

A.G., a minor child; by and through his  
guardian ad litem Jennifer Reeder,

Plaintiff,

vs.

CASE NO.: 2:22-cv-09179-JFW-AJR  
[Assigned to Hon. John F. Walter,  
District Court Judge, and Hon. A. Joel  
Richlin, Magistrate Judge]

Santa Maria Joint Union High School  
District, Laurie Ramirez, and Does 1-10,  
Defendants.

~~PROPOSED~~ PROTECTIVE  
ORDER RE: PRIVATE AND  
CONFIDENTIAL INFORMATION

FAC filed: May 16, 2023

Pursuant to the stipulation of all parties, and finding good cause therefor, IT IS  
HEREBY ORDERED:

1. The parties by counsel shall be bound by the terms of this Protective Order.
2. Subject to any limitations provided in this Protective Order, private and confidential records and information relevant to this proceeding, and requested by any Party, will be produced in its entirety, subject to objections that are not based on confidentiality or privacy.
3. Any and all information disclosed pursuant to this Order shall be used for the sole purpose of preparing for and conducting litigation of this action.
4. If any Party files with the Court or otherwise makes public any of the documents or information disclosed pursuant to this Order, that party's counsel shall redact private and confidential information, or file said documents under seal.
5. Any and all information disclosed pursuant to this Order shall not be disclosed, directly or indirectly, to persons other than:
  - (a) an attorney employed by a party for the purpose of working on this action;
  - (b) an employee of such attorney who is working on this action;
  - (c) a person who is hired to provide administrative, clerical, or support functions that require access to such documents;
  - (d) with respect to a particular document, a person who is named on the face of such document as having been its author or one of its recipients, or who appears from other documents or testimony to have been the author or recipient of such document(s);

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- 1 (e) an independent consultant or expert retained by a party or attorney to  
2 prepare for or conduct this litigation;
- 3 (f) a person to whom it is otherwise reasonably essential that the material be  
4 shown for purposes of that person giving testimony or making litigation  
5 decisions in this action;
- 6 (g) a stenographer, court reporter, or videographer present in his or her  
7 official capacity at any hearing, deposition, or proceeding in this action;  
8 and
- 9 (h) any court before which this action is pending, including court personnel  
10 who are authorized by the judges of the court to review such information.

11 6. Before any document produced pursuant to this Order is disclosed to any  
12 person described in 6 (e) or (f), the party providing the documents will make  
13 reasonable efforts to ensure that the person to whom the disclosure is made  
14 understands and will abide by the terms of this Order, and will provide that person  
15 with a copy of this Order.

16 7. Even after the termination of this litigation, the confidentiality  
17 obligations imposed by this Order shall remain in effect until and unless a court order  
18 otherwise directs.

19 IT IS SO ORDERED.

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21 Dated: April 30, 2024

  
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A. Joel Richlin  
United States Magistrate Judge